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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARMEN MEREJIL,
aka "Caveman,"
ARMANDO CONTRERAS,
aka "Risky,"
aka "R,"
ALEJANDRO SANDOVAL,
aka "Squeaky,"
EDWARD ROSALES,
aka "Solo,"
MANUEL GARCIA,
aka "Lil Evil,"
aka "E,"
GALDINO DIAZ,
aka "Dino,"
aka "D,"
CHITO JARA,
ESTHER CHAN,
MARISELA RAMIREZ, and
CRISTAL GOMEZ RAYO,

Defendants.

CR No.

CR18-00774-JAK

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances; 21 U.S.C. §§ 841(a)(1), (b)(1)(A), (b)(1)(B): Possession with Intent to Distribute, and Distribution of, Methamphetamine; 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm and Ammunition]

1 The Grand Jury charges:

2 GENERAL ALLEGATIONS

3 At all times relevant to this Indictment:

4 1. The East Side Torrance drug trafficking organization ("EST
5 DTO") was a drug trafficking organization associated with the East
6 Side Torrance street gang (the "EST Gang"), and operated in the
7 Central District of California and elsewhere.

8 2. The EST Gang was a multi-generational street gang within
9 the "Harbor Gateway" area of the City of Los Angeles. The EST Gang
10 was formed in the 1970s in the area near the intersection of Menlo
11 Avenue and West 228th Street. Over the intervening years, the EST
12 Gang grew to presently claim "territory" bounded by West 223rd Street
13 on the north, South Normandie Avenue on the east, West Sepulveda
14 Boulevard on the south, and South Western Avenue, which is the
15 eastern boundary of the City of Torrance, to the west ("EST Gang
16 Territory"). EST Gang Territory has, at times, also included the
17 area north of West 223rd Street between Normandie and Western Avenues
18 extending northward to Carson Street.

19 3. The EST DTO was a drug trafficking operation associated
20 with the EST Gang. Many of the members of the EST DTO were members
21 of the EST Gang; however, not all EST Gang members were members of
22 the EST DTO, and the EST DTO included persons who were not members of
23 the EST Gang. The EST DTO controlled drug distribution within EST
24 Gang Territory, and also conducted drug distribution outside EST Gang
25 Territory. A portion of the revenue collected by the EST DTO was
26 paid to a prison-based criminal organization for "authorization" to
27 sell controlled substances in EST Gang Territory unhindered.
28

1 4. The EST DTO maintained control of its drug trafficking
2 activities in conjunction with the EST Gang by attacking and
3 threatening non-EST Gang or DTO members who entered EST Gang
4 Territory; intimidating and threatening residents in EST Gang
5 Territory; and using EST Gang graffiti, hand signs, and other symbols
6 and paraphernalia within EST Gang Territory to indicate that the EST
7 Gang controlled the area, and that the EST DTO was the exclusive
8 illegal drug seller in EST Gang Territory. Members of the EST Gang
9 and DTO also possessed and carried firearms in order to maintain
10 control of EST Gang Territory, as well as to retaliate against
11 rivals.

12 5. The EST DTO attempted to control all drug trafficking
13 within EST Gang Territory by its members. In order to do so, EST DTO
14 members extorted money from other drug traffickers who were not
15 members of the EST DTO who sold methamphetamine, heroin, and other
16 drugs in EST Gang Territory. These non-EST DTO drug traffickers were
17 forced to pay a "tax" (a portion of the proceeds of drug sales) to
18 principals of the EST DTO. If a non-EST DTO drug trafficker refused
19 to pay the tax to the EST DTO, that drug trafficker faced reprisals
20 from EST DTO and/or EST Gang members, including fines, robbery, and
21 threatened or actual violence. On the other hand, if a non-EST DTO
22 drug trafficker did pay the tax to the EST DTO, that drug trafficker
23 would be given authorization from the EST DTO to sell drugs in EST
24 Gang Territory and would not receive interference from the EST DTO or
25 EST Gang.

26 6. The central hub for the EST DTO's drug trafficking
27 activities was the Normandale Recreation Center, a park and community
28

1 recreation facility located between Normandie Avenue and Halldale
2 Avenue along West 225th Street in the City of Los Angeles.

3 7. EST DTO members were typically expected to participate in
4 drug trafficking on behalf of the EST DTO, as well as in other
5 activities such as protecting drug trafficking activities, assisting
6 in the enforcement of taxation of non-EST DTO members, and ensuring
7 that the EST DTO's drug trafficking activities avoided detection by
8 law enforcement. This often was referred to as "putting in work."
9 New members of the EST DTO were required to "put in work" in order to
10 earn "respect" within the organization, and to help ensure the EST
11 DTO's control over EST Gang Territory.

12 8. The EST DTO included members and associates of other gangs
13 or DTOs, or others who were unaffiliated. EST DTO associates often
14 acted on behalf of, and for the benefit of, the EST DTO, by engaging
15 in supplying, possessing, and re-selling drugs as well as money
16 laundering and assisting in avoiding detection of the EST DTO by law
17 enforcement.

18 9. The EST DTO was controlled principally by a senior member
19 of the EST Gang (the "Shotcaller"). The Shotcaller was responsible
20 for ensuring that the goals of the EST DTO were met. These goals
21 included generating revenue by managing the drug trafficking
22 activities in EST Gang Territory and extorting tax proceeds from non-
23 EST DTO drug dealers, among others.

24 10. The EST DTO had a symbiotic relationship with the EST Gang,
25 and functioned as the primary revenue-generating branch of the EST
26 Gang; while the EST Gang conducted surveillance and detection of law
27 enforcement as well as territorial protection, enforcement, and
28 retaliation activities. EST Gang members and members of the EST DTO

1 engaged in overt conduct designed to explicitly demarcate EST Gang
2 Territory, in which only the EST DTO was allowed to sell controlled
3 substances unhindered. EST Gang members generally wore clothing that
4 identified them as EST Gang members, including blue, baby blue, and
5 black. The EST Gang has adopted the panther as its symbol, and EST
6 Gang members commonly wore clothing associated with the "Carolina
7 Panthers" National Football League franchise (the uniforms of which
8 also display the colors blue, baby blue, and black), in order to
9 exhibit their association with the EST Gang. EST Gang members often
10 tattooed an image of a panther, "EST," or "TORRANCE," in prominent
11 places on their bodies, including their face, neck, chest, back, and
12 on the top or back of their heads, and display these tattoos to show
13 their membership in, and loyalty to, the EST Gang. EST Gang members
14 commonly used "T" or "E" hand signs to identify membership or
15 allegiance to the EST Gang, and to intimidate rivals and members of
16 the public. Finally, EST Gang members identified EST Gang Territory
17 by spray-painting, or "tagging," on street signs, walls, and
18 buildings such things as the letters "EST," "Torrance," "EST XIII,"
19 "BEST," (for "Barrio EST") and as well as the monikers (street names)
20 of EST Gang members.

COUNT ONE

[21 U.S.C. § 846]

Paragraphs 1 through 10 of the General Allegations of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing to on or about November 1, 2018, in Los Angeles County, within the Central District of California, and elsewhere, defendants CARMEN MEREJIL, also known as ("aka") "Caveman" ("MEREJIL"), ARMANDO CONTRERAS, aka "Risky," aka "R" ("CONTRERAS"), ALEJANDRO SANDOVAL, aka "Squeaky" ("SANDOVAL"), EDWARD ROSALES, aka "Solo" ("ROSALES"), MANUEL GARCIA, aka "Lil Evil," aka "E" ("GARCIA"), GALDINO DIAZ, aka "Dino," aka "D" ("DIAZ"), CHITO JARA ("JARA"), ESTHER CHAN ("CHAN"), MARISELA RAMIREZ ("RAMIREZ"), and CRISTAL GOMEZ RAYO ("RAYO"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally possess with intent to distribute, and distribute, the following controlled substances:

1. at least 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii);

2. at least five grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii);

3. cocaine, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

1 4. heroin, a Schedule I narcotic drug controlled substance, in
2 violation of Title 21, United States Code, Sections 841(a)(1) and
3 841(b)(1)(C);

4 5. hydrocodone, a Schedule II narcotic controlled substance,
5 in violation of Title 21, United States Code, Sections 841(a)(1) and
6 841(b)(1)(C); and

7 6. 3,4-methylenedioxymethamphetamine ("MDMA"), a Schedule I
8 controlled substance, in violation of Title 21, United States Code,
9 Sections 841(a)(1) and 841(b)(1)(C).

10 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
11 ACCOMPLISHED

12 The objects of the conspiracy were to be accomplished in
13 substance as follows:

14 1. Defendant MEREJIL and others known and unknown to the Grand
15 Jury would authorize EST DTO members to control drug trafficking in
16 EST Gang Territory.

17 2. Defendants MEREJIL, CONTRERAS, SANDOVAL, ROSALES, and JARA,
18 and others known and unknown to the Grand Jury, would obtain large
19 quantities of controlled substances including methamphetamine,
20 cocaine, heroin, MDMA and hydrocodone, for redistribution.

21 3. Defendants MEREJIL and SANDOVAL, and others known and
22 unknown to the Grand Jury, would maintain a "stash house" on behalf
23 of the EST DTO where controlled substances were weighed and packaged
24 for redistribution.

25 4. Defendants MEREJIL, CONTRERAS, SANDOVAL, ROSALES, GARCIA,
26 DIAZ, JARA, CHAN, and RAMIREZ, and others known and unknown to the
27 Grand Jury, would obtain, possess with the intent to distribute, and
28 distribute controlled substances in EST Gang Territory and elsewhere.

1 5. Defendants MEREJIL, GARCIA, DIAZ, RAMIREZ, and RAYO, and
2 others known and unknown to the Grand Jury, would package controlled
3 substances for smuggling and smuggle them into the Kern Valley State
4 Prison, to be received by an incarcerated EST Gang member ("the EST
5 Inmate"), and who would redistribute the controlled substances in the
6 prison and provide payment for the drugs back to defendant MEREJIL
7 and other EST DTO members.

8 6. Defendants MEREJIL and CONTRERAS, and others known and
9 unknown to the Grand Jury, would arrange for the transportation of
10 controlled substances to an unindicted co-conspirator in the area of
11 Delta, Colorado (the "CO Distributor") for redistribution there.

12 7. Defendants MEREJIL, CONTRERAS, SANDOVAL, ROSALES, GARCIA,
13 and DIAZ, and others known and unknown to the Grand Jury, would
14 obtain and possess firearms and other dangerous weapons, and would
15 broker firearms transactions, in order to enforce the authority of
16 the EST DTO in EST Gang Territory, exclude other drug traffickers
17 from EST Gang Territory, and permit the EST DTO to control the drug
18 trafficking activity in EST Gang Territory.

19 C. OVERT ACTS

20 In furtherance of the conspiracy, and to accomplish the objects
21 of the conspiracy, on or about the following dates, defendants
22 MEREJIL, CONTRERAS, SANDOVAL, ROSALES, GARCIA, DIAZ, JARA, CHAN,
23 RAMIREZ, and RAYO, and others known and unknown to the Grand Jury,
24 committed various overt acts, within the Central District of
25 California, and elsewhere, including, but not limited to, the
26 following:

27 Overt Act No. 1: Between approximately 2014 and 2016, an
28 unindicted co-conspirator introduced the CO Distributor to defendant

1 MEREJIL, for the purpose of defendant MEREJIL establishing a
2 controlled substances distribution relationship with the CO
3 Distributor.

4 Overt Act No. 2: Between approximately 2014 and 2016,
5 defendant MEREJIL introduced the CO Distributor to defendant
6 CONTRERAS and told the CO Distributor that defendant CONTRERAS would
7 supply controlled substances to the CO Distributor for the CO
8 Distributor to re-sell to consumers in the area of Delta, Colorado.

9 Overt Act No. 3: On or about February 16, 2016, in EST Gang
10 Territory, defendant MEREJIL sold approximately 111.9 grams of a
11 mixture and substance containing a detectable amount of
12 methamphetamine to a Confidential Source ("CS") working with law
13 enforcement ("CS1").

14 Overt Act No. 4: On or about March 10, 2016, in EST Gang
15 Territory, defendant SANDOVAL possessed for distribution on his
16 person approximately 81.44 grams of methamphetamine in two separate
17 packages, and approximately \$5,245 in cash.

18 Overt Act No. 5: On or about March 10, 2016, inside an
19 apartment adjacent to EST Gang Territory (the "stash house"),
20 defendants MEREJIL and SANDOVAL possessed approximately 8.902
21 kilograms of methamphetamine, approximately 31.11 grams of a mixture
22 and substance containing a detectable amount of cocaine,
23 approximately 19 pills of MDMA, three digital scales, acetone,
24 denatured alcohol, methanol, a Pyrex bowl containing white
25 crystalline residue, a police scanner radio, a four-camera security
26 video device, a statue of a black panther, methamphetamine contained
27 in a suppository-shaped condom to allow for easy insertion into a
28 body cavity, documents referencing "EST XIII," mail and letters

1 addressed to defendant SANDOVAL, and documents setting forth amounts
2 owed or paid for controlled substances including by defendant
3 MEREJIL, the CO Distributor, and others.

4 Overt Act No. 6: On or about July 19, 2016, defendant ROSALES
5 possessed approximately 27.6 grams of methamphetamine with the intent
6 to distribute it, which was concealed in the plastic center panel of
7 his car.

8 Overt Act No. 7: On or about November 10, 2016, by text
9 message and telephone call using coded language, defendant ROSALES
10 asked defendant MEREJIL if defendant MEREJIL had controlled
11 substances available for sale, and defendant MEREJIL offered to
12 provide defendant ROSALES with controlled substances for further
13 distribution.

14 Overt Act No. 8: On or about November 10, 2016, by text
15 message using coded language, defendant CHAN told defendant MEREJIL
16 that she had high-quality controlled substances supplied by defendant
17 JARA to provide to defendant MEREJIL.

18 Overt Act No. 9: On or about November 12, 2016, by text
19 message using coded language, defendant MEREJIL advised defendant
20 CHAN to convey to defendant JARA, in an effort to obtain good prices
21 on controlled substances, that defendant MEREJIL reported to a senior
22 gang member with whom both defendants MEREJIL and JARA were familiar.

23 Overt Act No. 10: On or about November 12, 2016, by telephone
24 using coded language, defendant MEREJIL discussed with defendant JARA
25 the pricing of controlled substances available for sale by defendant
26 JARA.

27 Overt Act No. 11: On or about November 12, 2016, by telephone
28 using coded language, defendants MEREJIL and GARCIA engaged in a

1 lengthy discussion with an unindicted co-conspirator incarcerated at
2 Kern Valley State Prison in which they agreed to provide the
3 unindicted co-conspirator with heroin and cocaine to be smuggled into
4 Kern Valley State Prison and also provided the telephone number for
5 the EST Inmate, so that the unindicted co-conspirator could obtain
6 heroin inside Kern Valley State Prison from the EST Inmate.

7 Overt Act No. 12: On or about November 13, 2016, by text
8 message using coded language, defendant ROSALES asked defendant
9 MEREJIL if defendant MEREJIL could provide defendant ROSALES with an
10 amount of controlled substances for further distribution, and
11 defendant MEREJIL told defendant ROSALES that defendant ROSALES owed
12 defendant MEREJIL for a three-ounce controlled substances sales-
13 related debt, to which defendant ROSALES agreed.

14 Overt Act No. 13: On or about November 13, 2016, by text
15 message using coded language, defendant MEREJIL requested that
16 defendant RAMIREZ obtain controlled substances for defendant ROSALES,
17 and defendant RAMIREZ provided information regarding the quantity and
18 price of the controlled substances.

19 Overt Act No. 14: On or about November 13, 2016, by telephone
20 using coded language, defendant MEREJIL told an unindicted co-
21 conspirator that he needed to get a stash house, and that he intended
22 only to deal in kilogram quantities of controlled substances.

23 Overt Act No. 15: On or about November 15, 2016, by text and
24 multimedia messages using coded language, defendant CONTRERAS sent a
25 photograph of four firearms to defendant MEREJIL, and defendants
26 MEREJIL and CONTRERAS discussed the price and possibility of
27 purchasing the firearms.
28

1 Overt Act No. 16: On or about November 16, 2016, by telephone
2 using coded language, defendant MEREJIL told defendant ROSALES that
3 defendant MEREJIL was prepared to provide defendant ROSALES with
4 controlled substances to settle an outstanding debt.

5 Overt Act No. 17: On or about November 16, 2016, by text
6 message and telephone using coded language, an unindicted co-
7 conspirator asked defendant MEREJIL to provide him with controlled
8 substances, and defendant MEREJIL agreed to do so and told him to
9 come to defendant MEREJIL's house.

10 Overt Act No. 18: On or about November 16, 2016, by telephone
11 using coded language, defendant CONTRERAS advised defendant MEREJIL
12 that the CO Distributor owed money to defendant CONTRERAS, and that
13 defendant CONTRERAS had asked his firearms supplier to hold for
14 defendant CONTRERAS the firearms depicted in the photograph defendant
15 CONTRERAS had sent defendant MEREJIL on the previous day.

16 Overt Act No. 19: On or about November 16, 2016, defendant
17 MEREJIL distributed methamphetamine to two unindicted co-
18 conspirators, who drove with the methamphetamine into EST Gang
19 Territory and were arrested.

20 Overt Act No. 20: On or about November 17, 2016, by telephone
21 using coded language, defendant MEREJIL discussed with an unindicted
22 co-conspirator the unindicted co-conspirator's arrest on November 16,
23 2016.

24 Overt Act No. 21: On or about November 17, 2016, by telephone
25 using coded language, defendant MEREJIL asked defendant JARA to save
26 two units of controlled substances for defendant MEREJIL so defendant
27 MEREJIL could purchase them later.

1 Overt Act No. 22: On or about November 19, 2016, by text
2 message and telephone using coded language, defendant CHAN told
3 defendant MEREJIL that defendant JARA had controlled substances ready
4 to provide to defendant MEREJIL without advance payment by defendant
5 MEREJIL, and defendant JARA also confirmed this to defendant MEREJIL.

6 Overt Act No. 23: On or about November 21, 2016, by telephone
7 using coded language, defendant MEREJIL told defendant ROSALES that
8 defendant MEREJIL was prepared to provide defendant ROSALES with
9 controlled substances to settle an outstanding debt.

10 Overt Act No. 24: On or about November 22, 2016, by telephone
11 using coded language, defendant ROSALES asked defendant MEREJIL to
12 arrange a controlled substances transaction through an unindicted co-
13 conspirator.

14 Overt Act No. 25: On or about November 22, 2016, by text
15 message using coded language, defendant CHAN told defendant MEREJIL
16 she would obtain controlled substances from defendant JARA on behalf
17 of defendant MEREJIL and deliver those controlled substances to
18 defendant MEREJIL.

19 Overt Act No. 26: On or about November 22, 2016, defendant
20 CHAN drove to defendant JARA's residence, obtained approximately
21 445.9 grams of methamphetamine from defendant JARA, and drove in her
22 car towards defendant MEREJIL's residence in order to deliver the
23 methamphetamine to defendant MEREJIL, but was stopped by law
24 enforcement before reaching defendant MEREJIL's house.

25 Overt Act No. 27: On or about November 22, 2016, by telephone
26 using coded language, defendant MEREJIL told defendant RAMIREZ and
27 other unindicted co-conspirators that the police had stopped
28 defendant CHAN, who was bringing him a "pound" of methamphetamine,

1 near defendant MEREJIL's house, and further stated he was considering
2 jumping over the rear wall of his house in order to escape.

3 Overt Act No. 28: On or about November 22, 2016, by text
4 messages using coded language, defendant MEREJIL warned defendant
5 CONTRERAS and an unindicted co-conspirator that the police had
6 stopped defendant CHAN near his house and that defendant CONTRERAS
7 and others should not come to his house.

8 Overt Act No. 29: On or about November 23, 2016, defendant
9 ROSALES sent a multimedia message to defendant MEREJIL containing a
10 photograph that depicted two firearms, and by telephone using coded
11 language, defendant MEREJIL confirmed that he received it.

12 Overt Act No. 30: On or about November 23, 2016, by text
13 message using coded language, defendants MEREJIL and ROSALES
14 discussed the need to avoid law enforcement.

15 Overt Act No. 31: On or about November 23, 2016, by text
16 message and telephone using coded language, defendant MEREJIL
17 coordinated with defendant GARCIA and the EST Inmate regarding
18 picking up controlled substances from defendant DIAZ and sending them
19 to the EST Inmate in Kern Valley State Prison.

20 Overt Act No. 32: On or about November 23, 2016, by text
21 message using coded language, defendant MEREJIL agreed to coordinate
22 with defendant DIAZ to ship a controlled substance to the EST Inmate.

23 Overt Act No. 33: On or about November 23 and 24, 2016, by
24 text message using coded language, the EST Inmate reminded defendant
25 MEREJIL to pick up controlled substances from defendant DIAZ that
26 would be packaged for delivery to the EST Inmate at Kern Valley State
27 Prison.

1 Overt Act No. 34: On or about November 24, 2016, by text
2 message using coded language, defendant JARA proposed that defendant
3 MEREJIL enter into a payment plan or make a trade to compensate
4 defendant JARA for the methamphetamine that had been seized by law
5 enforcement from defendant CHAN, and defendant MEREJIL suggested that
6 if defendant JARA could provide defendant MEREJIL with additional
7 controlled substances, defendant MEREJIL would be able to repay the
8 debt quickly, and suggested meeting. Defendant JARA responded that
9 he would accept a handgun that had not been used in a crime to reduce
10 defendant MEREJIL's debt for the lost methamphetamine.

11 Overt Act No. 35: On or about November 24, 2016, by text
12 message using coded language, defendant MEREJIL told defendant JARA
13 that if defendant MEREJIL had \$1,600 he would have sent that to pay
14 defendant JARA for the methamphetamine that had been seized by law
15 enforcement from defendant CHAN, and offered instead to provide a box
16 of 2500 rounds of ammunition for an AR-15 assault rifle.

17 Overt Act No. 36: On or about November 25, 2016, by text
18 message using coded language, the EST Inmate provided information to
19 defendant MEREJIL regarding payment for controlled substances that
20 defendant MEREJIL was causing to be sent to the EST Inmate.

21 Overt Act No. 37: On or about November 25, 2016, an unindicted
22 co-conspirator caused \$500 to be sent by wire transfer to defendant
23 RAMIREZ, and in a text message using coded language notified
24 defendant MEREJIL that the unindicted co-conspirator had wired the
25 \$500.

26 Overt Act No. 38: On or about November 25, 2016, by text
27 message and telephone calls using coded language, defendant JARA
28 requested a photograph of the firearm defendant MEREJIL proposed to

1 exchange in partial or full satisfaction for the methamphetamine that
2 had been seized by law enforcement from defendant CHAN.

3 Overt Act No. 39: On or about November 26, 2016, by text
4 message and telephone using coded language, defendant MEREJIL and
5 defendant JARA discussed how defendant MEREJIL would repay defendant
6 JARA for the methamphetamine that had been seized by law enforcement
7 from defendant CHAN, including defendant MEREJIL selling controlled
8 substances and trading his Kalashnikov-style firearm and other
9 firearms for a portion of the debt, and defendant MEREJIL ultimately
10 agreed to trade his Kalashnikov-style firearm.

11 Overt Act No. 40: On or about November 26, 2016, by text
12 message and telephone using coded language, defendant MEREJIL,
13 defendant RAMIREZ, and the EST Inmate, coordinated and confirmed the
14 EST Inmate's \$500 payment to defendant MEREJIL for controlled
15 substances and the provision of additional controlled substances to
16 be delivered to the EST Inmate via defendant DIAZ.

17 Overt Act No. 41: On or about November 27, 2016, by text
18 message using coded language, defendant MEREJIL arranged to meet with
19 defendant JARA in order for defendant MEREJIL to inspect controlled
20 substances defendant JARA offered to provide. Defendant JARA
21 provided his address and defendant MEREJIL agreed to meet defendant
22 JARA.

23 Overt Act No. 42: On or about November 27, 2016, defendant
24 MEREJIL traveled to defendant JARA's residence in order to meet
25 defendant JARA.

26 Overt Act No. 43: On or about November 27, 2016, by text
27 message and telephone using coded language, defendant MEREJIL sent
28 defendant JARA a photograph of the Kalashnikov-style firearm he was

1 offering to exchange for part of his methamphetamine debt to
2 defendant JARA and his suppliers, and the two then negotiated the
3 value of the Kalashnikov-style firearm and the manner in which they
4 would conduct the transaction.

5 Overt Act No. 44: On or about November 27, 2016, by text
6 message using coded language, defendant MEREJIL advised the EST
7 Inmate that defendant MEREJIL had obtained controlled substances to
8 provide to defendant DIAZ for delivery to the EST Inmate.

9 Overt Act No. 45: On or about November 28, 2016, by text
10 message and telephone using coded language, defendant MEREJIL
11 confirmed to the EST Inmate that defendant MEREJIL would provide
12 controlled substances that night to defendant DIAZ for delivery to
13 the EST Inmate, and later that day discussed the logistics of
14 transferring the controlled substances to defendant RAYO.

15 Overt Act No. 46: On or about November 28, 2016, by text
16 message and telephone using coded language, defendant MEREJIL agreed
17 to meet with defendant JARA at defendant JARA's residence and deliver
18 money relating to the methamphetamine that had been seized by law
19 enforcement from defendant CHAN.

20 Overt Act No. 47: On or about November 28, 2016, defendants
21 MEREJIL and RAMIREZ traveled to defendant JARA's residence to deliver
22 money in relation to the pound of methamphetamine that had been
23 seized by law enforcement from defendant CHAN.

24 Overt Act No. 48: On or about November 28, 2016, by telephone
25 using coded language, defendant MEREJIL told defendant CHAN that
26 defendant MEREJIL had gone to see defendant JARA that day and on the
27 previous day to offer defendant JARA's suppliers with defendant
28 MEREJIL's Kalashnikov-style firearm, worth \$1,500, to compensate for

1 the methamphetamine seized by law enforcement from defendant CHAN,
2 and to continue to negotiate future controlled substance transactions
3 with defendant JARA.

4 Overt Act No. 49: On or about November 28, 2016, defendant
5 JARA possessed approximately \$8,280 in cash at his residence in
6 Hawaiian Gardens, California.

7 Overt Act No. 50: On or about November 29, 2016, by telephone
8 using coded language, defendants MEREJIL and ROSALES discussed the
9 fact that defendant MEREJIL presently had controlled substances
10 available for purchase and the price for those controlled substances,
11 defendant ROSALES indicated he presently needed at least a quarter
12 pound of controlled substances, defendant MEREJIL indicated it was
13 available, and defendant ROSALES told defendant MEREJIL that
14 defendant ROSALES expected to receive a shipment of controlled
15 substances the following day.

16 Overt Act No. 51: On or about November 30, 2016, by text
17 message and telephone using coded language, defendant MEREJIL updated
18 the EST Inmate on the status of defendant DIAZ's packaging and
19 wrapping of the controlled substances to be delivered to the EST
20 Inmate at the Kern Valley State Prison.

21 Overt Act No. 52: On or about November 30, 2016, by telephone
22 using coded language, defendant ROSALES told defendant MEREJIL that
23 defendant ROSALES needed to obtain controlled substances from
24 defendant MEREJIL.

25 Overt Act No. 53: On or about November 30, 2016, by telephone
26 using coded language, defendant MEREJIL agreed to provide controlled
27 substances to an unindicted co-conspirator.
28

1 Overt Act No. 54: On or about November 30, 2016, by text
2 message and telephone using coded language, defendant JARA informed
3 defendant MEREJIL that money had been seized from his house by law
4 enforcement and that he needed defendant MEREJIL to provide \$1,900
5 still owed, which defendant MEREJIL agreed to do, and at defendant
6 JARA's request, agreed to investigate whether defendant CHAN had
7 provided information to law enforcement regarding defendant JARA.

8 Overt Act No. 55: On or about December 1, 2016, by telephone
9 using coded language, defendant MEREJIL directed defendant CHAN to
10 contact defendant JARA and explain to defendant JARA that defendant
11 CHAN had not provided information to law enforcement regarding
12 defendant JARA.

13 Overt Act No. 56: On or about December 1, 2016, by telephone
14 and text message using coded language, defendant MEREJIL and an
15 unindicted co-conspirator who was driving northbound from the San
16 Diego area discussed the unindicted co-conspirator delivering six
17 units of controlled substances to defendant MEREJIL, and defendant
18 MEREJIL provided his address to the unindicted co-conspirator.

19 Overt Act No. 57: On or about December 1, 2016, by telephone
20 using coded language, defendant MEREJIL told an unindicted co-
21 conspirator that defendant MEREJIL had run out of high-quality
22 controlled substances but was in the process of obtaining them from a
23 second unindicted co-conspirator, and the first unindicted co-
24 conspirator indicated that she would visit defendant MEREJIL the
25 following day in order to obtain them.

26 Overt Act No. 58: On or about December 1 and 2, 2016, by text
27 message and telephone using coded language, defendant MEREJIL and the
28

1 EST Inmate agreed on which controlled substances should be provided
2 to defendant DIAZ for delivery to the EST Inmate.

3 Overt Act No. 59: On or about December 2, 2016, by telephone
4 using coded language, defendant MEREJIL and an unindicted co-
5 conspirator discussed the unindicted co-conspirator's efforts to
6 deliver controlled substances to defendant MEREJIL which were made
7 difficult because of law enforcement's detection of and following the
8 unindicted co-conspirator, and defendant MEREJIL provided the
9 unindicted co-conspirator supplier with the address of another
10 unindicted co-conspirator at which defendant MEREJIL could meet him.

11 Overt Act No. 60: On or about December 2, 2016, by text
12 message using coded language, defendants MEREJIL and ROSALES
13 discussed obtaining a shipment of controlled substances from an
14 unindicted co-conspirator.

15 Overt Act No. 61: On or about December 2, 2016, by text
16 message using coded language, defendants MEREJIL and JARA discussed
17 defendant MEREJIL having his Kalashnikov-style firearm to be
18 delivered to defendant JARA's co-conspirator in partial repayment for
19 the loss of methamphetamine that had been seized by law enforcement
20 from defendant CHAN, and defendant JARA indicated that an unindicted
21 co-conspirator would be calling defendant MEREJIL regarding the
22 firearm.

23 Overt Act No. 62: On or about December 3, 2016, by telephone
24 using coded language, defendant MEREJIL told defendant RAMIREZ to
25 provide defendant ROSALES with two pounds of controlled substances on
26 behalf of defendant MEREJIL, and defendant RAMIREZ acknowledged.

27 Overt Act No. 63: On or about December 3, 2016, by telephone
28 using coded language, defendant MEREJIL and an unindicted co-

1 conspirator discussed meeting so that defendant MEREJIL could obtain
2 no less than five units of controlled substances from the unindicted
3 co-conspirator, who was delivering the controlled substances.

4 Overt Act No. 64: On or about December 3, 2016, by telephone
5 using coded language, an unindicted co-conspirator contacted
6 defendant GARCIA, who was using defendant MEREJIL's telephone, and
7 told defendant GARCIA that the unindicted co-conspirator was seeking
8 a pound of controlled substances, which defendant GARCIA conveyed to
9 defendant MEREJIL, and defendant MEREJIL then discussed the price for
10 the controlled substances with the unindicted co-conspirator.

11 Overt Act No. 65: On or about December 3, 2016, by text
12 message using coded language, defendants MEREJIL and ROSALES
13 discussed obtaining a shipment of controlled substances from an
14 unindicted co-conspirator and the status of the EST DTO supply of
15 controlled substances, because defendant CONTRERAS needed a unit of
16 controlled substances.

17 Overt Act No. 66: On or about December 4, 2016, by text
18 message and telephone using coded language, defendant MEREJIL and the
19 EST Inmate discussed the logistics of defendant MEREJIL providing
20 controlled substances to the EST Inmate, including that defendant
21 GARCIA had packaged two of the units of controlled substances in
22 balloons and that defendant MEREJIL would deliver them to defendant
23 DIAZ and then provide them to a courier to be brought to the EST
24 Inmate. Defendant MEREJIL and the EST Inmate also discussed the
25 types of controlled substances defendant MEREJIL would be providing
26 to the EST Inmate.

27 Overt Act No. 67: On or about December 4, 2016, by telephone
28 using coded language, defendant MEREJIL confirmed with an unindicted

1 co-conspirator that defendant MEREJIL would transfer his Kalashnikov-
2 style firearm to the unindicted co-conspirator the next day in order
3 to repay defendant MEREJIL's debt for the pound of methamphetamine
4 that had been seized by law enforcement, and then contacted the
5 unindicted co-conspirator holding the Kalashnikov-style firearm, who
6 agreed to drive defendant MEREJIL to conduct the transfer the
7 following day.

8 Overt Act No. 68: On or about December 5, 2016, an unindicted
9 co-conspirator possessed, on behalf of defendant MEREJIL, a
10 Kalashnikov-style firearm, namely, a Zastava Arms model PAP M92PV,
11 7.62x39mm caliber rifle, and a Sig Sauer model P938, 9mm Parabellum
12 caliber semi-automatic pistol, at her residence in Lynwood,
13 California.

14 Overt Act No. 69: On or about December 5, 2016, by telephone
15 using coded language, defendant MEREJIL told an unindicted co-
16 conspirator that defendant MEREJIL planned to coordinate with
17 defendant ROSALES in order to obtain a shipment of controlled
18 substances from the unindicted co-conspirator.

19 Overt Act No. 70: On or about December 5, 2016, by telephone
20 using coded language, an unindicted co-conspirator called defendant
21 MEREJIL and told defendant MEREJIL that his telephone was being
22 tapped and to use a different telephone to contact her; defendant
23 MEREJIL thereafter changed his telephone number.

24 Overt Act No. 71: On or about January 25, 2017, by telephone
25 using coded language, defendant MEREJIL and the EST Inmate agreed
26 that defendant DIAZ would provide \$500 to defendant MEREJIL and the
27 EST Inmate would send \$800 through Western Union through defendant
28

1 RAMIREZ to satisfy the total debt for controlled substances of \$1,300
2 that the EST Inmate owed defendant MEREJIL.

3 Overt Act No. 72: On or about January 27, 2017, by text
4 message and telephone using coded language, the EST Inmate advised
5 defendant MEREJIL that he was sending \$200 via Wal-Mart money
6 transfer, defendant MEREJIL provided defendant RAMIREZ with
7 information for her to receive the money that had been transferred
8 via Wal-Mart in payment for controlled substances, defendant RAMIREZ
9 advised defendant MEREJIL that defendant RAMIREZ did not reach Wal-
10 Mart in time to pick up the money, and defendant MEREJIL conveyed
11 this to the EST Inmate, who requested that defendant MEREJIL provide
12 the controlled substances to defendants GARCIA or DIAZ.

13 Overt Act No. 73: On or about January 27, 2017, by telephone
14 using coded language, the EST Inmate asked defendant MEREJIL about
15 the cost of a firearm and defendant MEREJIL agreed to attempt to
16 obtain a firearm.

17 Overt Act No. 74: On or about January 29, 2017, by text
18 message using coded language, defendant MEREJIL discussed with
19 unindicted co-conspirators about whether an associate of another EST
20 Gang member was the same individual whom defendant MEREJIL believed
21 had provided information regarding defendant MEREJIL to law
22 enforcement.

23 Overt Act No. 75: On or about January 29, 2017, by text
24 message using coded language, an unindicted co-conspirator told
25 defendant MEREJIL that defendant MEREJIL needed to admonish his
26 associates not to talk loosely regarding their controlled substances
27 trafficking or firearms, and that the activities of the EST DTO
28 needed to be slowed down at the moment on account of law enforcement

1 activity, and defendant MEREJIL agreed and directed the unindicted
2 co-conspirator to listen to the unindicted co-conspirator's police
3 scanner radio.

4 Overt Act No. 76: On or about January 30, 2017, by text
5 message using coded language, defendant MEREJIL agreed with the EST
6 Inmate that defendant MEREJIL would obtain controlled substances and
7 provide them to defendant DIAZ, and defendants DIAZ and MEREJIL
8 arranged to meet.

9 Overt Act No. 77: On or about January 31, 2017, by telephone
10 using coded language, the EST Inmate advised defendant MEREJIL that
11 the EST Inmate had received some of the controlled substances caused
12 to be sent by defendant MEREJIL via a female courier, the EST Inmate
13 stated that defendant GARCIA was ready to assist in transporting
14 additional controlled substances to the EST Inmate, and defendant
15 MEREJIL acknowledged and stated that he had people looking for a
16 firearm at the direction of the EST Inmate.

17 Overt Act No. 78: On or about January 31, 2017, by text
18 message and telephone using coded language, defendant MEREJIL advised
19 defendant ROSALES to leave a co-conspirator's residence if he was
20 present there because of law enforcement activity in the area.

21 Overt Act No. 79: Between February 2 and 8, 2017, by text
22 message and telephone using coded language, defendant MEREJIL
23 brokered the sale and distribution of approximately 60 hydrocodone
24 pills to an unindicted co-conspirator.

25 Overt Act No. 80: On or about February 4, 2017, by telephone
26 using coded language, defendant MEREJIL agreed to try to obtain
27 controlled substances for the EST Inmate and deliver them within the
28 next few days to defendant GARCIA for packaging, and also offered to

1 obtain a .357 caliber revolver for \$400 at the direction of the EST
2 Inmate.

3 Overt Act No. 81: On or about February 5, 2017, by text
4 message using coded language, defendant MEREJIL advised an unindicted
5 co-conspirator that defendant MEREJIL had run out of controlled
6 substances.

7 Overt Act No. 82: On or about February 5, 2017, in text
8 messages using coded language, defendant MEREJIL admonished defendant
9 RAMIREZ that defendant MEREJIL had provided her controlled substances
10 free of charge.

11 Overt Act No. 83: On or about February 5, 2017, by telephone
12 using coded language, defendant MEREJIL directed an unindicted co-
13 conspirator to call a third party in order to obtain a pound of
14 controlled substances and then made the same request to another
15 unindicted co-conspirator.

16 Overt Act No. 84: On or about February 6, 2017, by text
17 message and telephone using coded language, defendant MEREJIL and the
18 EST Inmate discussed the logistics of sending controlled substances
19 to the EST Inmate and later confirmed that the controlled substances
20 would be packaged by defendant GARCIA and then transferred to
21 defendant DIAZ to be sent to the EST Inmate.

22 Overt Act No. 85: On or about February 6, 2017, by text
23 message and telephone using coded language, defendant MEREJIL
24 contacted defendant GARCIA and told defendant GARCIA that defendant
25 MEREJIL needed defendant GARCIA to package one unit of controlled
26 substances, to which defendant GARCIA agreed.

1 Overt Act No. 86: On or about February 7, 2017, by telephone
2 using coded language, defendant MEREJIL referred an unindicted co-
3 conspirator to defendant ROSALES to obtain controlled substances.

4 Overt Act No. 87: On or about February 8, 2017, by text
5 message using coded language, defendant MEREJIL asked defendant
6 GARCIA whether defendant GARCIA had delivered to defendant DIAZ the
7 package of controlled substances destined for the EST Inmate, and
8 defendant GARCIA replied that he would package and deliver the
9 controlled substances to defendant DIAZ the next day, which defendant
10 MEREJIL reported to the EST Inmate.

11 Overt Act No. 88: On or about February 8, 2017, by telephone
12 using coded language, defendant MEREJIL told the EST Inmate that
13 defendant MEREJIL had learned of another .357 caliber firearm that
14 was cheaper and a better brand that might be obtained for \$360,
15 agreed to provide defendant DIAZ with the controlled substances to be
16 sent to the EST Inmate, and agreed to contact defendant CONTRERAS in
17 order to attempt to obtain the controlled substances from defendant
18 GARCIA.

19 Overt Act No. 89: On or about February 8, 2017, by text
20 message and telephone using coded language, defendant MEREJIL
21 directed defendant CONTRERAS to wake up defendant GARCIA and tell
22 defendant GARCIA that the EST Inmate wanted his controlled substances
23 delivered, and defendant GARCIA confirmed that he had completed
24 wrapping the controlled substances intended for the EST Inmate and
25 had not himself kept any of the controlled substances intended for
26 the EST Inmate.

27 Overt Act No. 90: On or about February 9, 2017, by text
28 message using coded language, an unindicted co-conspirator offered to

1 defendant MEREJIL to check the price of a pound of controlled
2 substances, and defendant MEREJIL agreed to discuss the matter after
3 the unindicted co-conspirator came home from work.

4 Overt Act No. 91: On or about February 9, 2017, by text
5 message and telephone using coded language, defendant MEREJIL
6 arranged to collect the controlled substances intended for the EST
7 Inmate, traveled to San Pedro to meet with defendant GARCIA to obtain
8 them, and then delivered the controlled substances to defendant DIAZ
9 and confirmed with the EST Inmate that the delivery had been made.

10 Overt Act No. 92: On or about February 14, 2017, by text
11 message using coded language, the EST Inmate told defendant MEREJIL
12 that the EST Inmate had received the controlled substances defendants
13 MEREJIL, DIAZ, and GARCIA had caused to be delivered to him.

14 Overt Act No. 93: On or about February 16, 2017, by telephone
15 using coded language, defendant MEREJIL told an unindicted co-
16 conspirator to contact defendant ROSALES regarding controlled
17 substances.

18 Overt Act No. 94: On or about February 18, 2017, by telephone
19 using coded language, an unindicted co-conspirator told defendant
20 MEREJIL that the CO Distributor was in the area and was trying to
21 contact other EST DTO associates of defendant MEREJIL's but had been
22 unable to do so, whereupon defendant MEREJIL contacted defendant
23 GARCIA in order to have defendant GARCIA contact defendant CONTRERAS
24 to have defendant CONTRERAS coordinate with the CO Distributor.

25 Overt Act No. 95: On or about February 19, 2017, by telephone
26 using coded language, defendant CONTRERAS confirmed with defendant
27 MEREJIL that defendant CONTRERAS had made arrangements to provide the
28 CO Distributor with controlled substances for \$2,350.

1 Overt Act No. 96: On or about March 9, 2017, by text message
2 using coded language, defendant CONTRERAS asked the CO Distributor to
3 provide payment for controlled substances that had been provided to
4 the CO Distributor by defendant CONTRERAS, and the CO Distributor
5 responded that the CO Distributor's controlled substances trafficking
6 activities had been slow and that the CO Distributor would contact
7 defendant CONTRERAS the following Monday to obtain an account number
8 from defendant CONTRERAS into which the CO Distributor could deposit
9 the proceeds.

10 Overt Act No. 97: On or about March 10, 2017, by text message
11 using coded language, defendant MEREJIL requested additional
12 controlled substances from an unindicted co-conspirator to sell
13 because defendant ROSALES had only been able to provide defendant
14 MEREJIL with one unit of controlled substances.

15 Overt Act No. 98: On or about March 11, 2017, by text message
16 using coded language, defendant MEREJIL told defendant RAMIREZ that
17 he believed his telephone number being was tapped by law enforcement.

18 Overt Act No. 99: On or about March 13, 2017, by telephone
19 using coded language, defendant ROSALES asked defendant MEREJIL to
20 monitor his police scanners.

21 Overt Act No. 100: On or about March 13, 2017, by telephone
22 using coded language, the CO Distributor asked defendant CONTRERAS if
23 defendant CONTRERAS had an account number for the CO Distributor, and
24 defendant CONTRERAS inquired how much money the CO Distributor would
25 be sending to defendant CONTRERAS, to which the CO Distributor
26 responded \$1,500, and CONTRERAS then stated that he would obtain an
27 account number and provide it to the CO Distributor shortly.
28

1 Overt Act No. 101: On or about March 13, 2017, by text message
2 using coded language, defendant CONTRERAS sent the CO Distributor the
3 account number XXXXXX8237 and the name of the account holder.

4 Overt Act No. 102: On or about March 14, 2017, the CO
5 Distributor deposited \$1,500 into the Wells Fargo Bank account
6 bearing account number XXXXXX8237 at a Wells Fargo branch in Delta,
7 Colorado.

8 Overt Act No. 103: On or about March 15, 2017, by telephone
9 using coded language, defendant CONTRERAS and the CO Distributor
10 discussed numerous aspects of their controlled substances
11 trafficking, including the amount of money the CO Distributor owed,
12 defendant CONTRERAS' payment for and "taxes" owed, the increased
13 price of controlled substances, the CO Distributor's owing money for
14 controlled substances for which the CO Distributor had not received
15 payment, the slow pace of sales, the CO Distributor's efforts to
16 clear his debt, the CO Distributor paying for controlled substances
17 on the first and fifteenth of the month, and the possibility of the
18 CO Distributor delivering controlled substances to a location
19 approximately four hours from the CO Distributor.

20 Overt Act No. 104: On or about March 19, 2017, by telephone
21 using coded language, defendant ROSALES agreed to provide an ounce of
22 controlled substances to defendant MEREJIL.

23 Overt Act No. 105: On or about March 20, 2017, defendant
24 MEREJIL facilitated a telephone conversation between two unindicted
25 co-conspirators designed to help one of the unindicted co-
26 conspirators collect tax proceeds related to the controlled
27 substances trade.
28

1 Overt Act No. 106: On or about March 23, 2017, by text message
2 using coded language, defendant ROSALES told defendant MEREJIL that
3 defendant ROSALES had controlled substances to provide to defendant
4 MEREJIL.

5 Overt Act No. 107: On or about March 27, 2017, by text message
6 using coded language, defendant MEREJIL told an unindicted co-
7 conspirator that defendant MEREJIL wanted to obtain controlled
8 substances from defendant ROSALES.

9 Overt Act No. 108: On or about March 27, 2017, by telephone
10 using coded language, defendant ROSALES told defendant MEREJIL that
11 defendant ROSALES was in the process of obtaining controlled
12 substances, and defendants ROSALES and MEREJIL agreed to meet at a
13 later time in order to divide those controlled substances between
14 them.

15 Overt Act No. 109: On or about March 29, 2017, by text message
16 using coded language, defendant CONTRERAS asked about the CO
17 Distributor's controlled substances distribution operation status.

18 Overt Act No. 110: On or about March 31, 2017, defendant RAYO
19 traveled from Los Osos, California, to the area of Bakersfield,
20 California, for the purpose of smuggling controlled substances into
21 the Kern Valley State Prison.

22 Overt Act No. 111: On or about April 1, 2017, defendant RAYO
23 met with an unindicted co-conspirator in or near Bakersfield,
24 California, and accepted methamphetamine for smuggling into Kern
25 Valley State Prison.

26 Overt Act No. 112: On or about April 1, 2017, by text message
27 using coded language, defendant CONTRERAS told the CO Distributor
28 that it was the first of the month and inquired regarding the CO

1 Distributor's payment for controlled substances, and stated that he
2 and unindicted co-conspirators would have an account number ready to
3 accept the CO Distributor's payment in two days.

4 Overt Act No. 113: On or about April 1, 2017, by text message
5 using coded language, defendant RAYO attempted to reach the EST
6 Inmate via a contraband cellular telephone being kept by the EST
7 Inmate and others in Kern Valley State Prison.

8 Overt Act No. 114: On or about April 1, 2017, defendant RAYO
9 smuggled controlled substances into Kern Valley State Prison inside a
10 body cavity, with the intent that they would be delivered to the EST
11 Inmate by another unindicted co-conspirator inmate.

12 Overt Act No. 115: On or about April 2, 2017, defendant RAYO
13 smuggled approximately 52.08 grams of methamphetamine contained
14 within two candy bar wrappers into Kern Valley State Prison inside a
15 body cavity, with the intent that it would be delivered to another
16 unindicted co-conspirator who was incarcerated at the prison and the
17 EST Inmate.

18 Overt Act No. 116: On or about April 2, 2017, by text message
19 using coded language, defendant MEREJIL and an unindicted co-
20 conspirator discussed defendant MEREJIL selling controlled substances
21 to the unindicted co-conspirator via a courier the unindicted co-
22 conspirator did not fully trust.

23 Overt Act No. 117: On or about April 2, 2017, by text message
24 using coded language, defendant MEREJIL told an unindicted co-
25 conspirator that he believed he was being watched by law enforcement,
26 who were waiting for him to make a mistake that would allow him to be
27 arrested, but that law enforcement officers would have to kill him in
28 order to apprehend him.

1 Overt Act No. 118: On or about April 3, 2017, by text message
2 using coded language, defendants MEREJIL and ROSALES discussed
3 settling an outstanding debt related to the purchase of controlled
4 substances and trying to obtain additional controlled substances.

5 Overt Act No. 119: On or about April 3, 2017, by text message
6 using coded language, defendant CONTRERAS asked the CO Distributor
7 about the status of the CO Distributor's drug payment, and the CO
8 Distributor responded that he had not met with the individual
9 delivering him money that day but would let defendant CONTRERAS know
10 the status in the morning.

11 Overt Act No. 120: On or about April 4, 2017, by telephone
12 using coded language, the CO Distributor told defendant CONTRERAS
13 that the individual who owed money to the CO Distributor had not met
14 the CO Distributor, but that the CO Distributor could pay \$1,000 now,
15 and defendant CONTRERAS responded that defendant CONTRERAS would
16 supply the CO Distributor with an account number for depositing the
17 \$1,000.

18 Overt Act No. 121: On or about April 4, 2017, by text message
19 and telephone using coded language, defendants MEREJIL and ROSALES
20 discussed obtaining controlled substances from an unindicted co-
21 conspirator.

22 Overt Act No. 122: On or about April 5, 2017, by text message
23 using coded language, defendant MEREJIL told an unindicted co-
24 conspirator controlled substances supplier that he and defendant
25 ROSALES were both out of controlled substances and asked the
26 unindicted co-conspirator to supply them to defendant MEREJIL.

27 Overt Act No. 123: On or about April 5, 2017, by text message
28 using coded language, defendant CONTRERAS provided account number

1 XXXXXX8237 and the name of the account holder, into which the CO
2 Distributor should deposit \$1,000.

3 Overt Act No. 124: On or about April 5, 2017, by text message
4 and telephone using coded language, the CO Distributor and defendant
5 CONTRERAS discussed the particulars of potential firearms the CO
6 Distributor could buy for defendant CONTRERAS, and defendant
7 CONTRERAS asked the CO Distributor to obtain prices for certain types
8 of firearms.

9 Overt Act No. 125: On or about April 6, 2017, by text message
10 using coded language, defendant CONTRERAS directed the CO Distributor
11 to send \$1,000 and reconfirmed the account into which the CO
12 Distributor should deposit the \$1,000.

13 Overt Act No. 126: On or about April 7, 2017, the CO
14 Distributor deposited \$1,000 into the Wells Fargo Bank account
15 bearing account number XXXXXX8237, at a Wells Fargo branch in Delta,
16 Colorado.

17 Overt Act No. 127: On or about April 7, 2017, by telephone
18 using coded language, defendant MEREJIL agreed to provide an
19 unindicted co-conspirator with defendant ROSALES' telephone number so
20 the unindicted co-conspirator could obtain controlled substances from
21 defendant ROSALES.

22 Overt Act No. 128: On or about April 26, 2017, defendant
23 ROSALES sold approximately 27.25 grams of methamphetamine to a CS
24 ("CS2").

25 Overt Act No. 129: On or about May 12, 2017, defendant ROSALES
26 possessed a .45 caliber handgun, seven rounds of .45 caliber
27 ammunition, a .22 caliber handgun, and five rounds of .22 caliber
28 ammunition at his residence in San Pedro, California.

1 Overt Act No. 130: On or about May 15, 2017, in Delta,
2 Colorado, the CO Distributor possessed approximately 437.1 grams of
3 methamphetamine that had been provided to him by defendant CONTRERAS
4 for further redistribution, along with cocaine and marijuana.

5 Overt Act No. 131: On or about May 23, 2017, defendant MEREJIL
6 showed CS2 a notebook containing entries recording the amounts owed
7 by unindicted co-conspirators to defendant MEREJIL for controlled
8 substances, totaling approximately \$38,680.

9 Overt Act No. 132: On or about December 20, 2017, defendant
10 GARCIA possessed EST Gang paraphernalia, methamphetamine-use
11 paraphernalia, and controlled substances packaging material including
12 balloons, cellophane, small Ziploc bags and latex gloves at his
13 residence in Gardena, California.

14 Overt Act No. 133: On or about December 20, 2017, defendant
15 GARCIA possessed controlled substances hidden in his shoe, which he
16 removed and swallowed when he was about to undergo a strip search
17 conducted by officers of the Torrance Police Department.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about March 10, 2016, in Los Angeles County, within the Central District of California, defendant ALEJANDRO SANDOVAL, also known as "Squeaky," knowingly and intentionally possessed with intent to distribute at least fifty grams, that is, approximately 81.44 grams, of methamphetamine, a Schedule II controlled substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about March 10, 2016, in Los Angeles County, within the Central District of California, defendants CARMEN MEREJIL, also known as ("aka") "Caveman," and ALEJANDRO SANDOVAL, aka "Squeaky," knowingly and intentionally possessed with intent to distribute at least fifty grams, that is, approximately 8.902 kilograms, of methamphetamine, a Schedule II controlled substance.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about July 19, 2016, in Los Angeles County, within the Central District of California, defendant EDWARD ROSALES, also known as "Solo," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 27.6 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about November 22, 2016, in Los Angeles County, within the Central District of California, defendant CHITO JARA knowingly and intentionally distributed at least fifty grams, that is, approximately 445.9 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about November 22, 2016, in Los Angeles County, within the Central District of California, defendant ESTHER CHAN knowingly and intentionally possessed with intent to distribute at least fifty grams, that is, approximately 445.9 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SEVEN

[18 U.S.C. § 922(g)(1)]

On or about May 12, 2017, in Los Angeles County, within the Central District of California, defendant EDWARD ROSALES, also known as "Solo" ("ROSALES"), knowingly possessed a firearm, namely, a North American Arms model NAA22MS, .22 Winchester Magnum Rimfire caliber revolver, bearing serial number E312997, and ammunition, namely, five rounds of Armscor Precision, Inc., .22 caliber ammunition and six rounds of Winchester .45 Auto caliber ammunition, in and affecting interstate and foreign commerce.

Such possession occurred after defendant ROSALES had been convicted of at least one of the following felony crimes, each punishable by imprisonment for a term exceeding one year:

(1) Assault with a Firearm, in violation of California Penal Code Section 245(a)(2), in the Superior Court of the State of California, County of Los Angeles, case number NA078815, on or about April 12, 2013;

(2) Assault with a Deadly Weapon, in violation of California Penal Code Section 245(a)(1), in the Superior Court of the State of California, County of Los Angeles, case number NA078815, on or about April 12, 2013;

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1 (3) Taking Vehicle Without Owner's Consent, in violation of
2 California Vehicle Code Section 10851(a), in the Superior Court of
3 the State of California, County of Los Angeles, case number YA088818,
4 on or about June 2, 2014.

5
6 A TRUE BILL

7
8 151
9 Foreperson

10 NICOLA T. HANNA
11 United States Attorney

12 

13 LAWRENCE S. MIDDLETON
14 Assistant United States Attorney
15 Chief, Criminal Division

16 JUSTIN R. RHOADES
17 Assistant United States Attorney
18 Chief, Violent & Organized Crime
19 Section

20 JEFF MITCHELL
21 Assistant United States Attorney
22 Deputy Chief, Violent & Organized
23 Crime Section

24 GREGORY A. LESSER
25 Assistant United States Attorney
26 Violent & Organized Crime Section
27
28